

Exhibit H

U.S. v. Romero-Romero

CR 07-0711 MMC

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5
6 Counsel for Defendant ROMERO-ROMERO

7 IN THE UNITED STATES DISTRICT COURT
8 FOR THE NORTHERN DISTRICT OF CALIFORNIA
9

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.
13

14 OSCAR ERNESTO ROMERO-ROMERO,
JR.,

15 Defendant.
16

No. CR-07-711 MMC

**DECLARATION OF SANDRA EVELYN
ROMERO**

17
18 Sandra Evelyn Romero states as follows:

- 19 1. I am the mother of the defendant in the above-captioned case. This declaration was
20 composed with the assistance of my son's lawyer, Assistant Federal Public Defender
21 Jodi Linker. This declaration does not necessarily include every detail that I
22 remember. Rather, it includes those facts which Ms. Linker has advised me would be
23 appropriate for inclusion.
- 24 2. My son Oscar Ernesto Romero-Romero, Jr. (hereinafter "Oscar") was born on May
25 11, 1980 in El Salvador. He has four siblings: (1) Hilda Cristabel Romero, born
26 December 13, 1975 in El Salvador; (2) Sandra Jacqueline Romero, born February 27,

- 1 1977 in El Salvador; (3) Ernesto Alonso Romero, born January 23, 1982 in El
- 2 Salvador; (4) and Jancy Escarleth Romero, born April 1, 1984 in the United States.
- 3 3. Oscar Ernesto Romero Ventura (hereinafter "Mr. Ventura") is Oscar's biological
- 4 father.
- 5 4. I came to the United States in 1983 with Mr. Ventura and all of our children, except
- 6 Jancy, who had not been born yet. We left El Salvador to try to find a better life in
- 7 the United States. We moved to Los Angeles, California to be near my mother. My
- 8 children all attended public school in Los Angeles.
- 9 5. Mr. Ventura worked as a truck driver and I worked as a housekeeper.
- 10 6. On March 30, 1989, when he was eight years old, Oscar became a Lawful Permanent
- 11 Resident of the United States.
- 12 7. Mr. Ventura and I were married on February 8, 1987 in Los Angeles, California. Our
- 13 marriage was extremely difficult from the start. We often fought, and he physically
- 14 abused me repeatedly.
- 15 8. In 1992, Mr. Ventura was deported from the United States after he was caught
- 16 bringing another woman, Ada del Carmen Torres (hereinafter "Ms. Torres"), into this
- 17 country illegally.
- 18 9. Mr. Ventura told me that he had been having an affair with Ms. Torres and that she
- 19 was pregnant with his child. I was infuriated to learn this and it was clear to me that
- 20 our marriage was over.
- 21 10. When he was deported in 1992, our marriage was over. At that point, we were no
- 22 longer living together and I had no intention of continuing our marriage. I did not
- 23 intend to ever be back together with him.
- 24 11. I did not file for divorce at that time because I did not see why it was necessary, and I
- 25 also had a lot of family, cultural and religious pressure not to do so.
- 26 12. After Mr. Ventura was deported in 1992, all five of our children stayed with me, and I

1 maintained custody of all of our children.

2 13. When Mr. Ventura came back to the United States, he began living with Ms. Torres. I
3 learned that Ms. Torres gave birth to their daughter, Tanya Romero, in September of
4 1991.

5 14. Mr. Ventura was a truck driver by occupation so he was often on the road. Even after
6 we separated in 1992, he continued to use the addresses where I lived with our
7 children as his mailing addresses, however, he did not reside with me at those
8 addresses.

9 15. In 1996, I became a citizen of the United States. I truthfully indicated on my
10 naturalization application that I was married because, although Mr. Ventura and I had
11 separated, we had not divorced. If anyone asked me as part of my naturalization
12 application if we were separated, I would have truthfully informed them that we were
13 separated as of 1992. I also truthfully indicated on my naturalization application that
14 all of my children were living with me.

15 16. When my son Oscar was placed in immigration proceedings in 2003, I hired a lawyer
16 to assist him. I went to the Law Offices of Earl Carter, a lawfirm I understood to
17 specialize in immigration proceedings. An attorney named Timothy Myers from Mr.
18 Carter's office was assigned to my son's case.

19 17. Mr. Myers never asked me about my relationship with Mr. Ventura. Had he asked, I
20 would have told him that Mr. Ventura and I had separated in 1992. In addition, had
21 he asked me to file something with a court to establish that we had separated in 1992,
22 I would have done so.

23 18. At Oscar's deportation proceedings in 2003 and 2004, I could have truthfully testified
24 that at the time of my naturalization in 1996, Mr. Ventura and I were living separate
25 and apart and there had been a final rupture of our marriage. That had been the
26 situation since 1992. In addition, I believe that my daughters, Hilda and Sandra, and

1 my son, Ernesto, who were also present at Oscar's deportation proceeding, could have
2 testified to those facts.

3 19. All three of my daughters, Hilda, Sandra and Jancy are United States Citizens. They
4 all currently reside in Fontana, California.

5 I DECLARE under penalty of perjury that the foregoing is true and correct to the best of my
6 knowledge.

7 Signed and dated on the 10 of June, 2008, in Fontana Ca. 92335 (location).

8 Sandra E. Romero
9 SANDRA EVELYN ROMERO

10 INTERPRETER CERTIFICATION

11 I, _____, hereby certify that I am a certified Spanish interpreter and that
12 I accurately translated this declaration to Sandra Evelyn Romero over the telephone, she told me that
13 she understood it, and I believe her answer was true and correct.

14 Dated: _____

15 _____
16 Interpreter's signature
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1 my son, Ernesto, who were also present at Oscar's deportation proceeding, could have
2 testified to those facts.

3 19. All three of my daughters, Hilda, Sandra and Jancy are United States Citizens. They
4 all currently reside in Fontana, California.

5 I DECLARE under penalty of perjury that the foregoing is true and correct to the best of my
6 knowledge.

7 Signed and dated on the ____ of June, 2008, in _____ (location).

8
9 SANDRA EVELYN ROMERO

10 INTERPRETER CERTIFICATION

11 I, Melinda Basker, hereby certify that I am a certified Spanish interpreter and that
12 I accurately translated this declaration to Sandra Evelyn Romero over the telephone, she told me that
13 she understood it, and I believe her answer was true and correct.

14 Dated: 6/10/08

15 Melinda Basker
16 Interpreter's signature
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